

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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This document relates to:

*Federal Insurance Co., et al. v. Al Qaida, et al.*, No. 03-CV-6978

**AFFIRMATION OF SEAN P. CARTER IN SUPPORT OF THE MOTION OF  
PLAINTIFFS AXA, CHUBB & SON, MUNICH RE AMERICA, ONEBEACON  
INSURANCE GROUP AND TIG INSURANCE COMPANY TO ASSESS DAMAGES  
AGAINST DEFAULTED DEFENDANTS FOR BUSINESS AND PROPERTY CLAIMS  
UNDER THE ANTI-TERRORISM ACT**

Sean P. Carter, Esq., affirms as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned matter, and a member of the law firm Cozen O'Connor. I submit this Affirmation to transmit to the Court the following documents in support of the Memorandum of Law of Plaintiffs AXA, Chubb, Munich Re America, OneBeacon Insurance Group and TIG in Support of Their Motion to Assess Damages Against Defaulted Defendants For Business And Property Claims Under the Anti-Terrorism Act.

2. Exhibit A to this Affirmation is a true and correct copy of a chart outlining the means by which each of the defaulted defendants was properly served in this action.

3. Exhibit B to this Affirmation is a true and correct copy of a list of the defendants in default against whom Movants seek to assess damages via this motion.

4. Exhibit C to this Affirmation is a true and accurate copy of the Affidavit of Steven Judovin in support of AXA's Proof of Damages.

5. Exhibit D to this Affirmation is a true and accurate copy of the Affidavit of Donald L. Siegrist, Jr. in Support of Proof of Damages for Chubb & Son, a Division of Federal Insurance Company, on Behalf of Itself and as Manager of Its Insurance Subsidiaries

6. Exhibit E to this Affirmation is a true and correct copy of the Affidavit of Thomas J. Toth in Support of the Proof of Damages of American Alternative Insurance Company, The Princeton Excess and Surplus Lines Insurance Company and Great Lakes Reinsurance (UK) Limited. (Munich Reinsurance Group)

7. Exhibit F to this Affirmation is a true and accurate copy of the Affidavit of John F. Murphy in support of OneBeacon Insurance Group's Proof of Damages.

8. Exhibit G to this Affirmation is a true and accurate copy of the Affidavit of Robert Knowles in support of TIG Insurance Company's Proof of Damages.

9. Exhibit H to this Affirmation is a true and correct copy of this Court's order dated May 9, 2005, granting the Federal Insurance letter application seeking this Court's permission to file under seal schedules identifying the insureds in connection with default filings. Pursuant to this order, the schedules attached to Exhibits C through G are being filed under seal in order to protect the identity of the insureds from public disclosure.

Affirmed in Philadelphia, Pennsylvania on February 12, 2007.

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/s/  
Sean P. Carter